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*Attorneys for Twitter Investor Group and Co-  
Lead Counsel for the Proposed Class***UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**IN RE TWITTER, INC. SECURITIES  
LITIGATION

Case No. 4:19-cv-07149-YGR

This Document Relates To:

ALL ACTIONS.

**JOINT STIPULATION AND [PROPOSED]  
ORDER EXTENDING TIME**Judge: Hon. Yvonne Gonzalez Rogers  
Ctrm: 1, 4th Floor

**WHEREAS**, this action is a proposed class action alleging violations of the federal securities laws against Twitter, Inc. (“Twitter”), Jack Dorsey and Ned Segal (collectively “Defendants”);

**WHEREAS**, on November 22, 2019, the Court so ordered a joint stipulation that provided, among other things, that within 45 days following the appointment of a lead plaintiff, a consolidated complaint will be filed, and set forth a briefing schedule for Defendants’ anticipated motion to dismiss (ECF No. 21);

**WHEREAS**, on February 12, 2020, the Court so ordered the appointment of the Weston Family Partnership LLLP and the Twitter Investor Group as lead plaintiffs (“Lead Plaintiffs”) (ECF No. 45);

**WHEREAS**, absent an extension of time, a consolidated complaint is due to be filed on March 30, 2020; Defendants’ motion to dismiss is due to be filed on May 14, 2020; Lead Plaintiffs’

1 opposition to Defendants' motion to dismiss is due to be filed on June 29, 2020; and Defendants'  
2 reply is due to be filed on July 29, 2020;

3 **WHEREAS**, counsel for Lead Plaintiffs and Defendants in the above-captioned action  
4 have conferred and respectfully submit that good cause exists for a brief extension of fourteen (14)  
5 days for all deadlines in light of the COVID-19 public health emergency and related closures of the  
6 offices of counsel for Lead Plaintiffs and the mandatory shelter-in-place orders affecting counsel  
7 in California for Defendants and Lead Plaintiffs; and

8 **IT IS ACCORDINGLY STIPULATED**, by and between the undersigned counsel for the  
9 parties, that:

- 10 1. Lead Plaintiffs shall file the consolidated complaint on or before April 13, 2020;
- 11 2. Defendants shall move, answer or otherwise respond to the consolidated complaint  
12 within 60 days after the consolidated complaint is filed and served;
- 13 3. Lead Plaintiff shall file any opposition to any motion to dismiss within 60 days of  
14 Defendants' response to the consolidated complaint; and
- 15 4. Defendants shall file any reply in support of any motion to dismiss within 45 days  
16 of Lead Plaintiffs' opposition.

17 **IT IS SO STIPULATED.**

18  
19 DATED: March 23, 2020

20 Respectfully submitted,

21 **LATHAM & WATKINS, LLP**

**KAPLAN FOX & KILSHEIMER LLP**

22 By: /s/ Michele D. Johnson  
23 Michele D. Johnson

By: /s/ Laurence D. King  
Laurence D. King

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**ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)**

I, Laurence D. King, attest that concurrence in the filing of this document has been obtained from the other signatory. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 23rd day of March, 2020, at Oakland, California.

/s/ Laurence D. King  
Laurence D. King

**[PROPOSED] ORDER**

Pursuant to the Stipulation, Lead Plaintiffs' deadline to file their consolidated complaint is extended to April 13, 2020. Defendants shall move, answer or otherwise respond to the consolidated complaint within 60 days after the consolidated complaint is filed and served. Lead Plaintiff shall file any opposition to any motion to dismiss within 60 days of Defendants' response to the consolidated complaint. Defendants shall file any reply in support of any motion to dismiss within 45 days of Lead Plaintiffs' opposition.

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_

\_\_\_\_\_  
HON. YVONNE GONZALEZ ROGERS  
United States District Court Judge